

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION**

KLLM TRANSPORT SERVICES, LLC

PLAINTIFF

VS.

CIVIL ACTION NO. 3:12-CV-116-HTW-LRA

JBS CARRIERS, INC.

DEFENDANT

**PLAINTIFF'S MOTION FOR LEAVE TO
FILE DOCUMENTS UNDER SEAL**

In accordance with Local Uniform Civil Rule 79, Plaintiff KLLM Transport Services, LLC ("KLLM") respectfully requests that the Court grant it leave to file under seal KLLM's Motion for Attorneys' Fees and Litigation Costs, including all exhibits thereto.

KLLM's Motion for Attorneys' Fees and Litigation Costs and its exhibits contain highly confidential and proprietary information. In support of the motion, KLLM will be submitting multiple declarations from attorneys with the Baker Donelson Law Firm that contain discussions of their negotiated rate structure with KLLM, a long-time client, as well as details of the relationship. In addition, KLLM will be attaching copies of its time entries and expense information that reflect its fees and expenses incurred. This billing information contains sensitive information, including descriptions disclosing litigation strategy and an in-depth look into the attorney-client relationship.

To protect this sensitive and confidential information, KLLM seeks leave to file KLLM's Motion for Attorneys' Fees and Litigation Costs and all related exhibits under seal.

The undersigned counsel has attempted to confer with counsel for Defendant as to whether Defendant will oppose this motion but has received no response as of the time of this filing. Given the straightforward nature of this Motion, KLLM respectfully requests relief from the rule requiring a separate memorandum.

THIS the 15th day of October, 2015.

Respectfully submitted,

KLLM TRANSPORT SERVICES, LLC

By Its Attorneys,

BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC

s/ Michael V. Bernier

Michael V. Bernier (MSB No. 103960)

OF COUNSEL:

J. Stephen Kennedy (MSB No. 100040)
Cable M. Frost (MSB No. 100757)
Brad C. Moody (MSB No. 101628)
Michael V. Bernier (MSB No. 103960)
BAKER, DONELSON, BEARMAN,
CALDWELL & BERKOWITZ, PC
4268 I-55 North
Meadowbrook Office Park
Jackson, Mississippi 39211
Telephone: 601-351-2400
Facsimile: 601-351-2424

CERTIFICATE OF SERVICE

I hereby certify that I have this day electronically filed the foregoing paper with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

B. Lyle Robinson - robinsol@phelps.com

Brian G. Eberle - beberle@sah.com

THIS the 15th day of October, 2015.

s/ Michael V. Bernier

Michael V. Bernier